

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

Houston Justice, *et al.*,

Plaintiffs,

v.

Gregory Abbott, *et al.*,

Defendants.

No. 5:21-cv-00848-XR

Consolidated with *La Unión del Pueblo
Entero v. Abbott*, No. 5:21-cv-844

**HARRIS COUNTY REPUBLICAN PARTY, DALLAS COUNTY REPUBLICAN PARTY,
NATIONAL REPUBLICAN SENATORIAL COMMITTEE, AND NATIONAL
REPUBLICAN CONGRESSIONAL COMMITTEE’S [PROPOSED] ANSWER**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, National Republican Senatorial Committee, and National Republican Congressional Committee (the “Republican Committees”) respectfully answer Plaintiffs’ Complaint. Any allegation in the Complaint not explicitly responded to in this Answer is hereby denied.

INTRODUCTION

1. Statements of President Ronald Reagan speak for themselves and do not require a response. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through Texas Senate Bill 1 (“SB 1”). The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

2. Court decisions speak for themselves and do not require a response.

3. Voter turnout data speaks for itself and does not require a response. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The

Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 3 and so deny them.

4. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 4 and so deny them.

5. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 5 and so deny them. The Republican Committees specifically deny that Texas election laws are exclusionary.

6. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 6 and so deny them.

7. Statements made in media articles speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 7 and so deny them.

8. Statements made in media articles speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 8 and so deny them.

9. Statements made in media articles speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 9 and so deny them.

10. The Republican Committees deny that Texas “attempt[ed] to re-erect barriers to voting” or that the referenced actions were taken for racially discriminatory reasons. The

referenced executive order, statements made in media articles, and court decisions speak for themselves and do not require a response. Paragraph 10 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 10 and so deny them.

11. Court decisions speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 11 and so deny them.

12. Statements made in media articles and the referenced report speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 12 and so deny them.

13. Voter turnout data and statements made in media articles and the referenced report speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 13 and so deny them.

14. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 14 and so deny them.

15. The Republican Committees deny that Texas election laws impose “substantial barriers” to voting. Voter turnout data and statements made in media articles speak for themselves

and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 15 and so deny them.

16. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 16 and so deny them.

17. Voter turnout data and statements made in media articles speak for themselves and do not require a response. The Republican Committees otherwise deny the allegations in Paragraph 17.

18. The statute and its legislative history speak for themselves and do not require a response. The Republican Committees submit that Governor Abbott signed SB 1 into law on September 7, 2021.

19. The Republican Committees deny that SB 1 “make[s] voting harder for Latinos and Blacks” or that it “discourage[s]” voting. The statute and its legislative history speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 19 and so deny them.

20. The Republican Committees deny the allegations in Paragraph 20.

21. The Republican Committees admit that Plaintiffs purport to challenge provisions of SB 1. The Republican Committees otherwise deny the allegations in Paragraph 21, deny that Plaintiffs’ claims have merit, and deny that Plaintiffs are entitled to relief.

22. The Republican Committees deny the allegations in Paragraph 22.

23. The Republican Committees deny that Plaintiffs are entitled to relief.

JURISDICTION AND VENUE

24. Paragraph 24 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.

25. Paragraph 25 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.

26. Paragraph 26 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.

27. Paragraph 27 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.

28. Paragraph 28 states a legal conclusion that does not require a response. To the extent a response is required, the Republican Committees do not contest venue; and, except as expressly admitted, the Republican Committees deny any remaining allegations in Paragraph 28.

PARTIES

29. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 29 and so deny them.

30. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 30 and so deny them.

31. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 31 and so deny them. Paragraph 31 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

32. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 32 and so deny them.

33. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 33 and so deny them.

34. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 34 and so deny them.

35. The Republican Committees deny that Plaintiffs' description of SB 1 and its alleged effects is accurate. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 35 and so deny them. Paragraph 35 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

36. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 36 and so deny them.

37. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 37 and so deny them.

38. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 38 and so deny them.

39. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 39 and so deny them.

40. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 40 and so deny them.

41. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 41 and so deny them.

42. The Republican Committees deny that SB 1 burdens or denies the right to vote. The Republican Committees deny that Plaintiffs' description of SB 1 and its alleged effects is accurate. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 42 and so deny them. Paragraph 42 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

43. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 43 and so deny them.

44. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 44 and so deny them.

45. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 45 and so deny them.

46. The Republican Committees specifically deny that SB 1 harms the disability community or suppresses the right to vote. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 46 and so deny them. Paragraph 46 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

47. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 47 and so deny them.

48. Paragraph 48 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these

allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 48 and so deny them.

49. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 49 and so deny them.

50. The Republican Committees deny the allegations in Paragraph 50.

51. The Republican Committees deny that SB 1 has a “suppressive effect.” Paragraph 51 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 51 and so deny them.

52. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny that SB 1 imposes criminal penalties for fulfilling the responsibilities of an election judge. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 52 and so deny them. Paragraph 52 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

53. The Republican Committees admit that Defendant Abbott is the Governor of Texas and that Plaintiffs purport to sue him in his official capacity.

54. The Republican Committees admit that Defendant Esparza is the Deputy Secretary of State of Texas and that Plaintiffs purport to sue him in his official capacity. Paragraph 54

otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

55. The Republican Committees admit that Defendant Paxton is the Attorney General of Texas and that Plaintiffs purport to sue him in his official capacity. Paragraph 55 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

56. The Republican Committees admit that Defendant Callanen is the Bexar County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. Paragraph 56 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

57. The Republican Committees admit that Defendant Longoria is the Harris County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 57 and so deny them.

FACTUAL ALLEGATIONS

58. Court decisions speak for themselves and do not require a response. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 58 and so deny them.

59. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated

by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 59 and so deny them.

60. Court decisions speak for themselves and do not require a response. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 60 and so deny them.

61. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 61 and so deny them.

62. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 62 and so deny them.

63. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 63 and so deny them.

64. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 64 and so deny them.

65. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 65 and so deny them.

66. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 66 and so deny them.

67. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 67 and so deny them.

68. Court decisions and the referenced media article speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 68 and so deny them.

69. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 69 and so deny them.

70. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 70 and so deny them.

71. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 71 and so deny them.

72. The referenced congressional testimony speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 72 and so deny them.

73. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 73 and so deny them.

74. The referenced media article speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 74 and so deny them.

75. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 75 and so deny them.

76. The referenced letter speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 76 and so deny them.

77. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 196 (2008). Court decisions, the referenced media article, and statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 77 and so deny them.

78. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,”

voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees deny the allegations in paragraph 78.

79. Court decisions speak for themselves and do not require a response. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 79 and so deny them.

80. Court decisions and the referenced reports speak for themselves and do not require a response. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 80 and so deny them.

81. Court decisions and the referenced reports speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 81 and so deny them.

82. Court decisions, media articles, and the referenced reports speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 82 and so deny them.

83. Court decisions speak for themselves and do not require a response. The Republican Committees deny that Black and Latino Texans lack equal “ability to participate in the political process” and deny that SB 1 makes it harder for anyone to participate in the political process. Paragraph 83 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 83 and so deny them.

84. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 84 and so deny them.

85. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 85 and so deny them.

86. The Republican Committees deny that SB 1 “seeks to curb voter participation” in any Texas county. Paragraph 86 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 86 and so deny them.

87. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees deny that Texas election law imposes barriers on the right to vote. Paragraph 87 states legal conclusions and/or statements of what the

law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 87 and so deny them.

88. The referenced report speaks for itself and does not require a response. The Republican Committees deny that SB 1 denies anyone “equal access to the electoral process.” Paragraph 88 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 88 and so deny them.

89. Statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 89 and so deny them.

90. Media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 90 and so deny them.

91. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 91 and so deny them.

92. Media articles speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 92 and so deny them.

93. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 93 and so deny them.

94. Texas law speaks for itself and does not require a response. Paragraph 94 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 94 and so deny them.

95. Texas law speaks for itself and does not require a response. Paragraph 95 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 95 and so deny them.

96. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 96 and so deny them.

97. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 97 and so deny them.

98. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 98 and so deny them.

99. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 99 and so deny them.

100. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 100 and so deny them.

101. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 101 and so deny them.

102. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 102 and so deny them.

103. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 103 and so deny them.

104. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 104 and so deny them.

105. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 105 and so deny them.

106. Paragraph 106 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 106 and so deny them.

107. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 107 and so deny them.

108. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 108 and so deny them.

109. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 109 and so deny them.

110. The legislation speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 110 and so deny them.

111. The testimony speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 111 and so deny them.

112. The testimony speaks for itself and does not require a response. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 112 and so deny them.

113. Media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 113 and so deny them.

114. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,”

voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 114 and so deny them.

115. Legislative history and media articles speak for themselves and do not require a response. Paragraph 115 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 115 and so deny them.

116. Legislative history and media articles speak for themselves and do not require a response. Paragraph 116 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 116 and so deny them.

117. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 117 and so deny them.

118. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge

or information sufficient to form a belief about the truth of the allegations in Paragraph 118 and so deny them.

119. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny the allegations made in the witness's testimony. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 119 and so deny them.

120. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 120 and so deny them.

121. Legislative history and Census Bureau data speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 121 and so deny them.

122. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 122 and so deny them.

123. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 123 and so deny them.

124. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny that SB 7 would have had a discriminatory impact on voting. Paragraph 124 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required,

these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 124 and so deny them.

125. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 125 and so deny them.

126. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny that SB 7 would have had a disproportionate impact on large, urban counties or voters of color. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 126 and so deny them.

127. Legislative history and media articles speak for themselves and do not require a response. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 127 and so deny them.

128. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 128 and so deny them.

129. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 129 and so deny them.

130. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 130 and so deny them.

131. Legislative history and media articles speak for themselves and do not require a response. The Republican Committees deny that the intent of SB 1 is to “suppress voters” or that the legislation has “ties to white supremacy.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 131 and so deny them.

132. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 132 and so deny them.

133. Legislative history and the referenced sources speak for themselves and do not require a response. Paragraph 133 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 133 and so deny them.

134. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 134 and so deny them.

135. Legislative history and the referenced letter speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 135 and so deny them.

136. Press releases and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 136 and so deny them.

137. The references sources speak for themselves and do not require a response. Paragraph 137 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 137 and so deny them.

138. Legislative history speaks for itself and does not require a response. Paragraph 138 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 138 and so deny them.

139. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 139 and so deny them.

140. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 140 and so deny them.

141. Legislative history and media articles speak for themselves and do not require a response. Paragraph 141 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 141 and so deny them.

142. Media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 142 and so deny them.

143. Media articles and the referenced proclamation speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 143 and so deny them.

144. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 144 and so deny them.

145. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 145 and so deny them.

146. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 146 and so deny them.

147. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 147 and so deny them.

148. Legislative history and media articles speak for themselves and do not require a response. Paragraph 148 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 148 and so deny them.

149. Legislative history and media articles speak for themselves and do not require a response. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 149 and so deny them.

150. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 150 and so deny them.

151. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 151 and so deny them.

152. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 152 and so deny them.

153. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 153 and so deny them.

154. Legislative history and media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 154 and so deny them.

155. Legislative history and media articles speak for themselves and do not require a response. Paragraph 155 states legal conclusions and/or statements of what the law provides or

should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 155 and so deny them.

156. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 156 and so deny them.

157. The Republican Committees deny that SB 1 “targets” any particular method of voting. Paragraph 157 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 157 and so deny them.

158. The Republican Committees deny that SB makes voting “burdensome” for Black and Latino voters or “sends a message to people of color more broadly that their participation in the democratic process is not welcome.” Court decisions speak for themselves and do not require a response. Paragraph 158 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 158 and so deny them.

159. The Republican Committees deny that SB 1 “discourages and dissuades” voters of color from voting or “increas[es] the costs of voting.” The statute speaks for itself and does not

require a response. Paragraph 159 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 159 and so deny them.

160. The Republican Committees deny that SB 1 hinders county election officials' ability to administer elections. The statute speaks for itself and does not require a response. Paragraph 160 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 160 and so deny them.

161. The Republican Committees deny that SB 1 will disproportionately harm Black and Latino Texans. The statute speaks for itself and does not require a response. Paragraph 161 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 161 and so deny them.

162. The Republican Committees deny that SB 1 burdens Black and Latino voters. The statute speaks for itself and does not require a response. Paragraph 162 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 162 and so deny them.

163. Voter turnout and demographic data speak for themselves and do not require a response. To the extent a response is required, the Republican Committees deny that SB 1 “target[s]” any particular method and means of voting. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 163 and so deny them.

164. The statute and legislative history do not require a response. Paragraph 164 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 164 and so deny them.

165. The Republican Committees deny that SB 1 makes it more difficult for voters of color and voters with disabilities to cast a ballot in person. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 165 and so deny them.

166. Paragraph 166 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 166 and so deny them.

167. The statute speaks for itself and does not require a response. Paragraph 167 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 167 and so deny them.

168. The Republican Committees deny that SB 1 burdens any voter's ability to participate in the political process. Paragraph 168 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 168 and so deny them.

169. The Republican Committees deny that SB 1 undermines protections for voters. The statute speaks for itself and does not require a response. Paragraph 169 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 169 and so deny them.

170. The Republican Committees deny the allegations in Paragraph 170.

171. The Republican Committees deny the allegations in Paragraph 171.

172. The Republican Committees deny that SB 1 denies people with disabilities equal access to the early voting application process. The statute speaks for itself and does not require a response. Paragraph 172 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 172 and so deny them.

173. The Republican Committees deny that SB 1 imposes barriers on voters with disabilities, prevents eligible individuals from providing assistance, or denies anyone equal access to voting. The statute speaks for itself and does not require a response. Paragraph 173 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 173 and so deny them.

174. The Republican Committees deny that SB 1 denies voters with disabilities equal access to voting. The statute speaks for itself and does not require a response. Paragraph 174 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 174 and so deny them.

CLAIMS FOR RELIEF

Count One

175. The Republican Committees incorporate their responses to the preceding paragraphs.

176. Section 2 of the Voting Rights Act speaks for itself and does not require a response.

177. Court decisions speak for themselves and do not require a response. Paragraph 177 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

178. Court decisions speak for themselves and do not require a response. Paragraph 178 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

179. The Republican Committees deny that SB 1 reduces any voter's ability to participate in the political process. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 179 and so deny them.

180. The Republican Committees deny the allegations in Paragraph 180.

181. The Republican Committees deny the allegations in Paragraph 181.

182. The Republican Committees deny the allegations in Paragraph 182.

183. The Republican Committees deny the allegations in Paragraph 183.

184. The Republican Committees deny the allegations in Paragraph 184.

185. The Republican Committees deny the allegations in Paragraph 185.

186. Paragraph 186 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 186 and so deny them.

187. Legislative history and demographic data speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 187 and so deny them.

188. The Republican Committees deny the justification for SB 1 was “pretextual” and deny that SB 1 causes “disenfranchisement” or constitutes “racially motivated voter suppression.” The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 188 and so deny them.

189. The Republican Committees deny the allegations in Paragraph 189.

190. The Republican Committees deny the allegations in Paragraph 190.

Count Two

191. The Republican Committees incorporate their responses to the preceding paragraphs.

192. The statute speaks for itself and does not require a response. Paragraph 192 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

193. The Fourteenth Amendment to the U.S. Constitution speaks for itself and does not require a response.

194. Court decisions speak for themselves and do not require a response. Paragraph 194 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

195. Court decisions speak for themselves and do not require a response. Paragraph 195 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

196. The Republican Committees deny the allegations in Paragraph 196.

197. The Republican Committees deny the allegations in Paragraph 197.

198. Paragraph 198 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 198 and so deny them.

199. The Republican Committees deny that SB 1 “in response to” any demographic factors.

200. The Republican Committees deny the allegations in Paragraph 200.

201. The Republican Committees deny the allegations in Paragraph 201.

202. Paragraph 202 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

203. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 203 states legal conclusions and/or statements of what the law provides or should

provide, to which no response is required. To the extent a response is required, these allegations are denied.

204. The Republican Committees deny the allegations in Paragraph 204.

205. The Republican Committees deny the allegations in Paragraph 205.

Count Three

206. The Republican Committees incorporate their responses to the preceding paragraphs.

207. The Fifteenth Amendment to the U.S. Constitution speaks for itself and does not require a response.

208. The Fifteenth Amendment to the U.S. Constitution speaks for itself and does not require a response.

209. Court decisions speak for themselves and do not require a response. Paragraph 209 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

210. The Republican Committees deny the allegations in Paragraph 210.

Count Four

211. The Republican Committees incorporate their responses to the preceding paragraphs.

212. The Republican Committees deny the allegations in Paragraph 212.

213. Court decisions speak for themselves and do not require a response.

214. Court decisions speak for themselves and do not require a response. Paragraph 214 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

215. Court decisions speak for themselves and do not require a response. Paragraph 215 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

216. The Republican Committees deny the allegations in Paragraph 216.

217. The Republican Committees deny the allegations in Paragraph 217.

218. The Republican Committees deny the allegations in Paragraph 218.

219. The Republican Committees deny the allegations in Paragraph 219.

220. The Republican Committees deny the allegations in Paragraph 220.

221. The Republican Committees deny the allegations in Paragraph 221.

222. The Republican Committees deny the allegations in Paragraph 222.

223. The Republican Committees deny the allegations in Paragraph 223.

224. The Republican Committees deny the allegations in Paragraph 224.

225. The Republican Committees deny the allegations in Paragraph 225.

226. The Republican Committees deny the allegations in Paragraph 226 and deny that Plaintiffs are entitled to relief.

Count Five

227. The Republican Committees incorporate their responses to the preceding paragraphs.

228. The Due Process Clause of the Fourteenth Amendment to the U.S. Constitution speaks for itself and does not require a response.

229. Court decisions speak for themselves and do not require a response. Paragraph 229 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

230. The Republican Committees deny the allegations in Paragraph 230.

231. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 231 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

232. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 232 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

233. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 233 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

234. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 234 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

235. Paragraph 235 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 235 and so deny them.

236. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 236 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 236 and so deny them.

237. The Republican Committees deny the allegations in Paragraph 237.

Count Six

238. The Republican Committees incorporate their responses to the preceding paragraphs.

239. The statute and court decisions speak for themselves and do not require a response. Paragraph 239 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

240. The Republican Committees deny the allegations in Paragraph 240.

Count Seven

241. The Republican Committees incorporate their responses to the preceding paragraphs.

242. The referenced publication speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 242 and so deny them.

243. The statute and court decisions speak for themselves and do not require a response. Paragraph 243 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

244. The statute and court decisions speak for themselves and do not require a response. Paragraph 244 states legal conclusions and/or statements of what the law provides or should

provide, to which no response is required. To the extent a response is required, these allegations are denied.

245. The statute speaks for itself and does not require a response.

246. The statute speaks for itself and does not require a response. Paragraph 246 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 246 and so deny them.

247. Paragraph 247 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

248. The statute and regulations speak for themselves and do not require a response. Paragraph 248 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

249. The statute speaks for itself and does not require a response.

250. The statute speaks for itself and does not require a response. Paragraph 250 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

251. The Republican Committees deny the allegations in Paragraph 251.

252. The Republican Committees deny the allegations in Paragraph 252.

253. The Republican Committees deny the allegations in Paragraph 253.

254. The Republican Committees deny the allegations in Paragraph 254.

255. The Republican Committees deny the allegations in Paragraph 255.

Count Eight

256. The Republican Committees incorporate their responses to the preceding paragraphs.

257. The statute speaks for itself and does not require a response. Paragraph 257 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

258. Paragraph 258 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

259. Paragraph 259 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

260. Paragraph 260 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

261. Paragraph 261 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

262. Paragraph 262 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

263. Court decisions speak for themselves and do not require a response. Paragraph 263 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

264. The Republican Committees deny that SB 1 discriminates against voters with disabilities and deny that SB 1 violates Section 504 of the Rehabilitation Act. Paragraph 264 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

265. The Republican Committees deny the allegations in Paragraph 265.

266. The Republican Committees deny the allegations in Paragraph 266.

PRAYER FOR RELIEF

267. The Republican Committees deny that Plaintiffs are entitled to the relief requested.

268. The Republican Committees deny that Plaintiffs are entitled to the relief requested.

269. The Republican Committees deny that Plaintiffs are entitled to the relief requested.

270. The Republican Committees deny that Plaintiffs are entitled to the relief requested.

AFFIRMATIVE AND OTHER DEFENSES

Without assuming the burden of proof, and while reserving the right to assert all applicable affirmative defenses supported in law and fact, the Republican Committees assert the following affirmative defenses:

FIRST AFFIRMATIVE DEFENSE

The Court lacks subject matter jurisdiction over Plaintiffs' claims.

SECOND AFFIRMATIVE DEFENSE

The Complaint fails to allege sufficient facts upon which a claim for relief may be granted.

THIRD AFFIRMATIVE DEFENSE

Plaintiffs lack standing to assert their claims in the Complaint.

FOURTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred by the applicable statutes of limitations.

FIFTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred by the equitable doctrines of laches, estoppel, unclean hands, and/or waiver.

SIXTH AFFIRMATIVE DEFENSE

Plaintiffs have failed to join indispensable parties to this action.

CONCLUSION

The Republican Committees respectfully request that the Court (1) dismiss Plaintiffs' claims with prejudice and enter judgment for Defendants; (2) deny Plaintiffs' prayer for relief; and (3) grant other such relief as the Court may deem proper.

October 25, 2021

Respectfully submitted,

/s/ John M. Gore

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**Pro hac vice applications forthcoming*